

1 PHILLIP A. TALBERT
United States Attorney
2 PETE THOMPSON
Acting Regional Chief Counsel
3 Oscar Gonzalez de Llano
Special Assistant United States Attorney
4 Social Security Administration
160 Spear Street, Suite 800
5 San Francisco, CA 94105
Telephone: (510) 970-4818
6 Email: Oscar.Gonzalez@ssa.gov
Attorneys for Defendant
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10 UNITED STATES DISTRICT COURT
11 EASTERN DISTRICT OF CALIFORNIA
12

13 IRINA NEDASHKOVSKIY,

14 Plaintiff,

15 v.

16 KILOLO KIJAKAZI,
Acting Commissioner of Social Security,

17 Defendant.
18

No. 2:22-cv-00410-JDP

STIPULATED MOTION AND ~~PROPOSED~~
ORDER FOR AN EXTENSION OF TIME TO
RESPOND TO PLAINTIFF'S MOTION FOR
SUMMARY JUDGMENT

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20 IT IS HEREBY STIPULATED, by and between the parties through their respective
21 counsel of record, with the Court's approval, that Defendant's time for responding to Plaintiff's
22 Motion for Summary Judgment be extended sixty-eight days (68) days from September 22, 2022,
23 to November 29, 2022. This is Defendant's first request for an extension. Counsel for Plaintiff
24 has no objection to Defendant's request for an extension.

25 Good cause exists for this request. Defendant respectfully requests this additional time
26 because Counsel for Defendant has and will be unable to devote the time required to complete its
27 response. Counsel for Defendant currently has nine (9) merit briefs currently due in district court
28

1 cases in the next seven (7) days, twenty-five (25) merit briefs in the next thirty (30) days and
2 thirty-seven (37) merit briefs in the next sixty (60) days. Counsel also recently returned from
3 scheduled leave August 29, 2022 – September 5, 2022, will be out of the office a few days next
4 week, and the week of November 21 - 25. Given this current workload and leave schedule an
5 extension until November 29, 2022 should provide an opportunity for the undersigned Counsel
6 for Defendant to prioritize completing the response to Plaintiff's Motion for Summary Judgment.
7 Furthermore, a reassignment of this matter to another staff attorney is currently not tenable given
8 the high volume of cases that all of our limited staff (due to leave and resignations) is handling.
9 Counsel apologizes to the Court for any inconvenience caused by this delay. All other dates in
10 the Court's Scheduling Order shall be extended accordingly.

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12 Respectfully submitted,

13 PHILLIP A. TALBERT
14 United States Attorney

15 DATE: September 20, 2022

16 By: s/ Oscar Gonzalez de Llano
17 OSCAR GONZALEZ DE LLANO
18 Special Assistant United States Attorney
19 Attorneys for Defendant

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21 Respectfully submitted,

22 Attorneys for Plaintiff

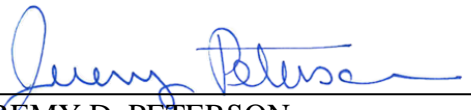
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24 DATE: September 20, 2022

25 By: s/ JESSE S. KAPLAN *
26 JESSE S. KAPLAN
27 (*as authorized by email)
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ORDER

Pursuant to Defendant's Motion, IT IS ORDERED that Defendant shall have an extension, up to and including November 29, 2022, to respond to Plaintiff's Motion for Summary Judgment.
IT IS SO ORDERED.

Dated: September 23, 2022



JEREMY D. PETERSON
UNITED STATES MAGISTRATE JUDGE